



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

July 9, 1997

**BY FACSIMILE AND U.S. MAIL**

James Bopp, Esq.  
Bopp, Coleson & Bostrom  
2 Foulkes Square  
401 Ohio St.  
P.O. Box 8100  
Terre Haute, IN 47808-8100

RE: MUR 3774  
National Right to Life Committee, Inc.  
National Right to Life Political Action  
Committee and Amarie C. Natividad,  
as treasurer  
Minnesota Citizens Concerned for Life, Inc.  
Minnesota Citizens Concerned for Life  
Committee for a Pro-Life Congress and  
its treasurer

Dear Mr. Bopp:

As we discussed by phone on Monday, July 7, this letter confirms the date and time for our inspection of NRLC calendars, confirms deposition dates for certain employees, consultants, and/or officers and directors of your clients, referenced above, and addresses the documents still due from MCCL, Inc. and MCCL PAC pursuant to the Commission's February 11, 1997 Subpoenas and Orders.

As agreed, we will meet you at the NRLC offices at 1 p.m. tomorrow, July 10, to inspect and copy relevant portions of the 1992 calendar of Darla St. Martin and the 1992 and 1994 calendars of David O'Steen and Jacki Ragan in accordance with the Commission's February 11 Subpoena and Order to NRLC. You have represented that Carol Long and Heather Clapsaddle do not have calendars for 1992 and 1994.

Additionally, we have agreed to depose Jacqueline Schwietz on August 5, 1997 in Minneapolis, MN and Marice Rosenberg on August 6, 1997 in either Minneapolis or Brainerd, MN. Staff members from this office are currently checking on the comparable costs of our

traveling to Brainerd or paying for Ms. Rosenberg's travel to Minneapolis and are making arrangements regarding the place for the depositions. I will notify you of the places and times for these depositions as soon as possible.

With regard to the depositions of NRLC and NRL PAC personnel, we have agreed to depose Darla St. Martin on Tuesday, July 29, David O'Steen on Wednesday July 30 and Carol Long on Thursday, July 31, 1997. Each of these depositions will be held at the Commission beginning at 9:30 a.m. Also, we tentatively agreed to depose Jacki Ragan on Monday, July 28 beginning at 1:30 p.m. Please contact me to confirm that date and time. The deposition subpoenas are being express mailed to you today under separate cover.

Finally, you advised me on Monday that you needed to speak to Jacqueline Schwietz regarding some of her concerns about bank statements and other documents still to be produced by MCCL and MCCL PAC pursuant to the Commission's February 11, 1997 Subpoenas and Orders to those entities. The bank statements and other documents and information missing from MCCL/MCCL PAC's initial responses of April 16, were described in a letter to you from Jose Rodriguez dated May 29, 1997. As you know, the requested information was due on June 5, 1997. Although you produced some of the missing information on July 3, we still have not received the bank statements, invoices, checks and missing facsimile pages described in the May 29 letter. Moreover, we still have not received identification information for the five individuals referenced in the May 29 letter, all of whom were named in MCCL/MCCL PAC's April 16 responses. As I advised you in one of the several phone conversations we have had since June 5, the Commission has already authorized a subpoena enforcement action to obtain any information not produced by MCCL/MCCL PAC in accordance with the Subpoenas and Orders. While I have been trying to work with you to avoid that course of action, I will have to advise the Litigation Division to proceed with a subpoena enforcement suit unless we receive the outstanding documents and information by close of business on July 16.

Please contact me at (202) 219-3400 if you have any questions or concerns.

Sincerely,



Dawn M. Odrowski  
Attorney